Douglas S. Draper, La. Bar No. 5073
<a href="mailto:ddraper@hellerdraper.com">ddraper@hellerdraper.com</a>
Leslie A. Collins, La. Bar No. 14891
<a href="mailto:lcollins@hellerdraper.com">lcollins@hellerdraper.com</a>
Greta M. Brouphy, La. Bar No. 26216
<a href="mailto:gbrouphy@hellerdraper.com">gbrouphy@hellerdraper.com</a>
Heller, Draper & Horn, L.L.C.
<a href="mailto:650">650</a> Poydras Street, Suite 2500
<a href="mailto:New Orleans">New Orleans</a>, LA 70130

Telephone: (504) 299-3300

Fax: (504) 299-3399

Attorneys for The Dugaboy Investment Trust and Get Good Trust

## UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE: \* Chapter 11

\*

\* Case No. 19-34054sgj11

HIGHLAND CAPITAL MANAGEMENT, L.P.

\*

Debtor \*

## STATEMENT OF THE ISSUES TO BE PRESENTED PURSUANT TO FED. R. BANKR. P. 8009

Pursuant to Fed. R. Bankr. P. 8009, The Dugaboy Investment Trust and Get Good Trust ("Appellants") by and through undersigned counsel, hereby identify the following issues to be presented on appeal Order Denying as Moot Motion to Compel Compliance with Bankruptcy Rule 2015.3 (related document # 2256) [Dkt. # 2812]:

## STATEMENT OF THE ISSUES TO BE PRESENTED

1. Whether the Bankruptcy Court erred in issuing an order dismissing as moot the Appellants Motion to Compel Compliance with Bankruptcy Rule 2015.3 solely on the basis that the Effective Date of the Debtors Fifth Amended Plan of Reorganization had occurred.

September 28, 2021

/s/Douglas S. Draper.
Douglas S. Draper, La. Bar No. 5073
ddraper@hellerdraper.com
Leslie A. Collins, La. Bar No. 14891
lcollins@hellerdraper.com
Greta M. Brouphy, La. Bar No. 26216
gbrouphy@hellerdraper.com
Heller, Draper & Horn, L.L.C.
650 Poydras Street, Suite 2500
New Orleans, LA 70130
Telephone: (504) 299-3300
Fax: (504) 299-3399
Attorneys for The Dugaboy Investment Trust
and Get Good Trust

## **CERTIFICATE OF SERVICE**

I, Douglas S. Draper, certify that on September 28, 2021, the *Statement of The Issues To Be Presented Pursuant To Fed. R. Bankr. P. 8009* was filed electronically through the Court's ECF system, which provides notice to all parties of interest.

/s/Douglas S. Draper
Douglas S. Draper, La. Bar No. 5073